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AIG FINANCIAL PRODUCTS CORP. and
9 AIG SUNAMERICA LIFE ASSURANCE COMPANY

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 COUNTY OF SAN MATEO,

Case No. CV 08-04751 MMC

13 Plaintiff,

14 v.

15
16 BANK OF AMERICA, N.A., et al.

17 Defendants.
18
19

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING DATE FOR CASE
MANAGEMENT CONFERENCE**

20 Pursuant to Civil Local Rules 6-2 and 7-12, this stipulation is entered into by and between
21 plaintiff COUNTY OF SAN MATEO (the "County") and defendants AIG FINANCIAL PRODUCTS
22 CORP. and AIG SUNAMERICA LIFE ASSURANCE COMPANY (the "AIG Defendants") through
23 their respective counsel of record, based upon the following:

24 WHEREAS, in a stipulation filed on December 12, 2008 with this Court, the parties stipulated
25 that no defendant need respond before March 16, 2009, to the amended complaint filed by plaintiffs on
26 November 24, 2008,

27 WHEREAS, although the consent of defendants other than the AIG Defendants is not required
28 because no defendant's position is compromised by this Stipulation, counsel for the AIG Defendants

can nevertheless report that identified counsel for the other defendants that have appeared in this action have been canvassed and all support the Court's approval of this Stipulation;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, and the parties jointly move as follows:

1. That the Court extend the date for the case management conference, originally scheduled for Friday, January 30, 2009, to Friday, March 27, 2009,

2. That the deadlines for submitting the case management conference statement, Rule 26(f) report, initial closures, the Alternative Dispute Resolution ("ADR") certificate and ADR stipulation or Notice of Need for ADR phone conference, and any other documents with deadlines dependent on the case management conference date be continued accordingly, and

3. No defense of any defendant to this action is prejudiced or waived by its submission of this Stipulation, including but not limited to assertion of jurisdictional defenses.

4. Defense counsel may file notices of appearance in this action without prejudice to their respective clients' jurisdictional and venue defenses.

The parties have previously stipulated that no defendant need respond to the County's amended complaint before March 16, 2009. Dkt. No. 38. Thus, the parties believe that scheduling the case management conference after that date will not adversely affect the scheduling in the case.

IT IS SO STIPULATED.

Dated: January 12, 2009

AKIN GUMP STRAUSS HAUER & FELD LLP

By /s/
Reginald D. Steer

Attorneys for Defendants
AIG FINANCIAL PRODUCTS CORP. and
AIG SUNAMERICA LIFE ASSURANCE
COMPANY

Dated: January 12, 2009

COTCHETT, PITRE, & MCCARTHY

By /s/
Nanci E. Nishimura

Attorneys for Plaintiff
COUNTY OF SAN MATEO

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: January 14, 2009


Hon. Maxine M. Chesney